

## EXHIBIT 10

### DECLARATION OF JAMES KNOEPP

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA

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FELIPE DE JESUS AVILA-SOTO, et al.	)	
	)	Case No. 6:24-cv-01392
Plaintiffs,	)	
	)	JUDGE ROBERT R. SUMMERHAYS
v.	)	
	)	MAGISTRATE JUDGE CAROL B.
	)	WHITEHURST
SOUTH CENTRAL SUGAR CANE	)	
GROWERS' ASSOCIATION, INC., et al.	)	
	)	
Defendants.	)	
	)	

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**DECLARATION OF JAMES KNOEPP**

1. I am one of Plaintiffs' attorneys in this matter. I have been practicing law since 1998 and have represented migrant workers from Mexico employed pursuant to employment visas for more than 25 years.

2. During my time representing migrant workers from Mexico I have been counsel in a number of FLSA collective actions in which notice was sent to similarly situated workers whose permanent residences were in Mexico.

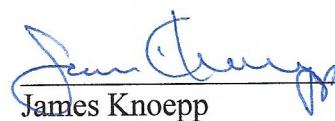
3. In those prior cases, FLSA notice was sent to workers via postal mail to Mexico and, in more recent cases, also via email. In my experience, the sending of notice via postal mail to Mexico can be slow and sometimes uncertain as workers may have moved or be away from their home. In those prior cases I would often receive returned postal mail months after the notice was sent, either because it was undeliverable or uncollected.

4. It is not uncommon for workers from Mexico who regularly work with H-2A or H-2B employment-based visas to be migrating away from their permanent residences in Mexico for months at a time, making the timely delivery of mailed notices uncertain.

5. Because Mexican postal mail can be slow and uncertain if workers are migrating, it is often faster and with fewer missed or returned deliveries to communicate using email, text messaging, and the WhatsApp messaging platform. In at least the last five (5) years these have been increasingly common methods of communications with workers from Mexico than relying solely on postal mail service.

6. Pursuant to 28 U.S.C. § 1746 and under penalty of perjury, I declare that the foregoing facts are true and correct to the best of my knowledge.

Executed on November 18, 2025.



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James Knoepp